

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Nautilus Insurance Company, ) C/A No. 2:22-cv-1307-RMG  
                                )  
                                Plaintiff, )  
Versus                         )                              **DEFENDANT MOSS & KUHN, P.A.'S**  
                                )                              **VOIR DIRE**  
Richard Alexander Murdaugh, Sr., Cory )  
Fleming, Moss & Kuhn, P.A., Chad    )  
Westendorf, and Palmetto State Bank,    )  
                                )  
Defendants.                 )

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The Defendant Moss & Kuhn, P.A. (hereinafter “this Respondent”), by its undersigned attorneys, hereby submits the following Voir Dire questions to the Court to be asked to the jury:

1.       Has any member of the Jury or their family ever been represented by, been a business associate of, or been either a social friend or acquaintance of attorneys Jaan Rannik or Clinton Magill or any employee of Epting & Rannik, LLC?
2.       Has any member of the Jury or their family ever been represented by, been a business associate of, or been either a social friend or acquaintance of attorney Gregg Meyers, located in Byron, Minnesota?
3.       Has any member of the Jury or their family ever been represented by, been a business associate of, or been either a social friend or acquaintance of attorneys Bobby Hood, Jr. or Maryrose Williamson or any employee of Hood Law Firm, LLC?
4.       Has any member of the Jury or their family ever been represented by, been a business associate of, or been either a social friend or acquaintance of attorney Thomas Pendarvis or any employee of Pendarvis Law Offices, P.C., located in Beaufort, South Carolina?

5. Has any member of the Jury or their family ever been represented by, been a business associate of, or been either a social friend or acquaintance of attorney Phillip Barber, located in Columbia, South Carolina?

6. Has any member of the Jury or their family ever been employed by Nautilus Insurance Company?

7. Is any member of the Jury related by blood or marriage or have you ever been a business associate, social friend, or acquaintance of Cory Fleming?

8. Is any member of the Jury related by blood or marriage or have you ever been a business associate, social friend, or acquaintance of Alex Murdaugh?

9. Has any member of the Jury or their family ever been employed by Moss & Kuhn, P.A.?

10. Is any member of the Jury related by blood or marriage or have you ever been a business associate, social friend, or acquaintance of Chad Westendorf?

11. Has any member of the Jury or their family ever been employed by Palmetto State Bank?

12. Has any member of the Jury or their family ever been employed by Lloyd's of London?

13. Is any member of the Jury a relative, business associate, or been either a social friend or acquaintance of any of the following persons or their immediate family:

Amy Coryer-Miller  
John Grantland  
Fred Kuhn  
Jan Malinowski  
Tony Satterfield  
Brian Harriott

Jon Austen  
Scott Wallinger  
David Rheneys  
Lynn Davidson  
Russell Laffitte

14. Does any member of the Jury have any knowledge of the facts, circumstances, or issues of this case?

15. Has any member of the Jury already formed an opinion concerning any of the issues or persons involved in this case?

16. Has any member of the Jury ever been involved in a personal injury claim?

17. Has any member of the Jury ever settled a claim with an insurance company?

18. Has any member of the Jury ever been responsible for investigating an accident as part of their job duties?

19. Did any member of the Jury panel watch the Alex Murdaugh murder trial on TV?

20. Is any member of the Jury panel familiar with the death of Alex Murdaugh's former housekeeper Gloria Satterfield?

21. Does any member of the Jury known of any reason whatsoever that you cannot give all parties a fair and impartial trial?

22. Will you be able to listen to the evidence and the law of which I will instruct you in this case and render a fair and impartial verdict?

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**December 23, 2024**  
Charleston, South Carolina

**/s/ Maryrose P. Williamson**  
Robert H. Hood, Jr. (FED #6998)  
[bobbyjr.hood@hoodlaw.com](mailto:bobbyjr.hood@hoodlaw.com)  
Maryrose P. Williamson (FED #12802)  
[Maryrose.williamson@hoodlaw.com](mailto:Maryrose.williamson@hoodlaw.com)

*Attorneys for the Defendant  
Moss & Kuhn, P.A.*

**CERTIFICATE OF SERVICE**

I certify that on this date a copy of the **DEFENDANT MOSS & KUHN, P.A.'S VOIR DIRE** was served on each party or counsel of record by  mailing,  e-mailing,  facsimile, or  hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.

This 23<sup>rd</sup> day of December, 2024.

/s/ Maryrose P. Williamson